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11 Attorneys for United States of America

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 SAN FRANCISCO DIVISION

15 UNITED STATES OF AMERICA, ) NO. CR 15-00582 WHO  
16 Plaintiff, )  
17 v. ) UNITED STATES' EX PARTE APPLICATION  
18 ADAM SHAFI, ) AND [PROPOSED] ORDER PERMITTING  
19 Defendant. ) DISCLOSURE OF PRETRIAL SERVICES  
20 ) REPORT AND ADDENDUM  
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29 The United States respectfully applies ex parte for an order permitting disclosure of all pretrial  
30 services reports in this case. The United States has filed an appeal of this Court's reconsideration of its  
31 pretrial detention order with the United States Court of Appeals for the Ninth Circuit. In order to  
32 adequately brief the appeal and to provide a complete record to the Court of Appeals, the United States  
33 asks that this Court order Pretrial Services to provide a copy of any Pretrial Services reports and their  
34 addenda to counsel for the United States and the defendant for use during the appeal. The United States  
35 further requests this Court order that counsel for the United States or the Pretrial Services Office may  
36 file a copy of the pretrial services reports in the Ninth Circuit and that any filing of the reports and their  
37 addenda with respect to the appeal be made under seal.

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39 EX PARTE APPLICATION AND [PROPOSED] ORDER  
40 CR 15-0582 WHO

1 Accordingly, the United States moves this Court to issue an order that Pretrial Services provide  
2 a copy of all pretrial services reports and their addenda in this case to counsel for the United States and  
3 the defense for use in the pending appeal of this Court's detention order. Defendant's counsel does not  
4 object to the United States' request.

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6 DATED: November 13, 2018

Respectfully submitted,

7 ALEX G. TSE  
8 United States Attorney

9 \_\_\_\_\_/s/  
10 ELISE LAPUNZINA  
S. WAQAR HASIB  
11 Attorneys for the United States of America  
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EX PARTE APPLICATION AND [PROPOSED] ORDER  
CR 15-0582 WHO

1 [PROPOSED] ORDER

2 Having considered the United States' Application for an Order Permitting the Disclosure of  
3 Pretrial Services Report and Addendum, it is hereby ORDERED that: (1) Pretrial Services shall provide  
4 copies of the pretrial services reports and their addenda in this case to the attorneys for the United States  
5 and defendant which shall be returned to Pretrial Services at the conclusion of the appeal; (2) counsel for  
6 the United States or the Pretrial Services Office may file a copy of the pretrial services reports in the  
7 Ninth Circuit; and (3) any filing of the reports and their addenda with respect to the appeal shall be made  
8 under seal.

9  
10 DATED: \_\_\_\_\_

11 HONORABLE WILLIAM H. ORRICK  
12 UNITED STATES DISTRICT JUDGE